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**SENT VIA EMAIL TO:** Brian.McDonough@usdoj.gov

Brian M. McDonough, Esq.  
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801 W. Superior Ave., Ste. 400  
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**Re:   *United States of America v. John Clements***  
**Case No. 1:15-cr-00275-DAP**

Mr. McDonough:

I hope this correspondence finds you well. On or about December 8, 2014, I sent you a letter on behalf of Mr. Clements setting forth some additional discovery materials that were being requested pursuant to Fed. R. Crim. P. 16, as well as *Brady v. Maryland*, 373 U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972). To date, we have not received any response regarding the availability of these materials and/or whether the Government intends – or is able – to comply with this supplemental discovery demand. I would respectfully request that you respond to the instant request in writing advising as to the Government's position concerning this matter, including whether and/or when the requested materials will be produced.

Thank you in advance for your prompt attention to this request. I look forward to speaking with you soon.

Very truly yours,



Eric C. Nemecek, Esq.

cc: file

